

UNITED STATES DISTRICT COURT
WESTERN DISTRICT TENNESSEE
EASTERN DIVISION

RICSUNG INTERNATIONAL LIMITED, and
FUIJAN MINHOU MINXING WEAVING CO., LTD.

PLAINTIFFS,

vs.

No. 1:08-CV-01213-JDB

XEBEX CORPORATION, a/k/a
TETRA PACIFIC CORPORATION,

DEFENDANT.

**RULE 30(b)(6) NOTICE OF DEPOSITION
OF DEFENDANT XEBEX CORPORATION**

TO: Jennifer K. Craig, Esq.
WALDROP & HALL, P. A.
106 S. Liberty Street
Jackson, TN 38301

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs will take the deposition of Xebex Corporation a/k/a Tetra Pacific Corporation, who shall designate one or more officers, directors, managing agents, or other persons, who consent to testify on its behalf, with respect to the allegations in Plaintiffs' Complaint and specifically the designated areas set forth on Exhibit A attached hereto on **Tuesday, September 23, 2009, beginning at 9:30 a.m.** at the offices of Butler, Snow, O'Mara, Stevens & Cannada, PLLC, 6075 Poplar Avenue, Suite 500, Memphis, TN 38119 before an officer authorized by law to administer oaths. The deposition will be taken before a court reporter and/or videographer and will begin on said day, continuing thereafter from day to day until completed.

As used herein, Xebex Corporation includes any and all legal entities or fictitious names under which it has done or is doing business together with all predecessors in interest, divisions, subsidiaries, regardless of ownership, or affiliates thereof, whether owned in whole or in part, and all agents or representatives thereof.

You are invited to attend and take part in the examination.

Respectfully submitted, this 8th day of September, 2009.

**BUTLER, SNOW, O'MARA, STEVENS
& CANNADA, PLLC**

/s/ R. Campbell Hillyer
James E. Bailey III (15979)
R. Campbell Hillyer (22124)
6075 Poplar Avenue, Suite 500
Memphis, TN 38119
(901) 680-7200
(901) 680-7201 facsimile
cam.hillyer@butlersnow.com

CERTIFICATE OF SERVICE

I do hereby certify that on this the 8th day of September, 2009, I served a true and correct copy of the above and foregoing by ECF email to counsel for Defendant at craigj@waldrophall.com and dabbsgoldenr@waldrophall.com

/s/ R. Campbell Hillyer

EXHIBIT A

1. Communications, whether oral or in writing, between either Plaintiff and Defendant dealing with or relating to the business relationship between Plaintiffs and Defendant or any allegations contained within the Complaint or Counterclaim..

2. The business relationship between Defendant and Ricsung as admitted in paragraph 7 of Defendant's Answer filed in this cause.

3. Any and all outstanding monetary amounts now due and owing to either Plaintiff by Defendant.

4. The agreement, upon which you base the allegations set forth in paragraph 10 of the Counterclaim filed in this cause.

5. The allegation of tortious interference of contractual relations as contained in paragraph 16 and 18 of the Counterclaim filed in this cause.

6. The allegations of breach of contract/unjust enrichment as contained in paragraph 23 of the Counterclaim filed in this cause.

7. Any information contained in Xebex's financial statements, accounting reports, State and Federal tax returns for the years 2006 to the present.

8. The identity of all witnesses Defendant may call at trial, the substance of the knowledge of each such person and the source of that person's knowledge.

9. The identity of each person having any information or knowledge of facts relevant to the subject matter of this litigation, the substance of the knowledge of each person and the source of that person's knowledge.

10. The current business operations of Xebex including scope, nature and locations.

11. Any other litigations in which Xebex or its owner(s) have been involved from 2006 to the present time.